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United States Government **Department of Energy**

Bonneville Power Administration

memorandum

DATE: October 27, 2005

REPLY TO ATTN OF: KEP/Celilo-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-270- Lapine-Chiloquin transmission line Project #: **V-R-06/01**

TO: Elizabeth Johnson
Natural Resource Specialist - TFE/The Dalles

Proposed Action: The project activities will be conducted along the Right-of-Way (ROW) of the Lapine-Chiloquin and Lapine Fort Rock transmission line corridor. The corridor along this section of the proposed project averages 125 feet in width and crosses approximately 47 miles of high dessert terrain through USFS, BLM, and private lands.

Location: The proposed project is located in Klamath and Deschuetes Counties, Oregon in the BPA Redmond Region.

Proposed by: Bonneville Power Administration (BPA).

Description of the Proposal: During the fall of FY 06', BPA proposes to clear unwanted vegetation along the Lapine-Chiloquin right-of-way (Lapine sub to Highway 138), along access roads and around tower structures that may impede the operation and maintenance of the subject transmission line. All work will be in accordance with the National Electrical Safety Code and BPA Vegetation Management FEIS, dated 2000. BPA plans to manage vegetation with the goal of removing tall growing vegetation that is currently or will soon become a hazard to the transmission line. (A hazard is defined as one or more branches, tops, and/or whole trees that could fall or grow into the minimum safety zone of the transmission line(s) causing an electrical arc, relay and/or outage.) The width of the ROW easement varies from 125-155 feet. All work will be accomplished by selective vegetation control methods (except for access roads and tower sites) to ensure that there is little potential harm to non-target vegetation and to low-growing plants. The work will provide system reliability.

BPA's goals for managing noxious weeds are to prevent and eradicate new invaders, and to control established infestations. The proposed action is designed to achieve these goals by implementing an integrated noxious weed management program within the transmission line corridor. The proposed action would involve one or a combination of management approaches including manual/mechanical, biological, and chemical methods to control noxious weeds. Determining which method(s) to use, when and how often, will be based on (but not limited to) the following factors: (1) Physical growth characteristics of target weeds (rhizomatous vs. tap-rooted, *etc.*); (2) seed longevity and germination; (3) infestation size; (4) relationship of the site to other infestations; (5) relationship of the site to listed species and/or proposed for listing under the ESA; (6) distance to surface water; (7) accessibility to site for equipment; (8) type and amount of use of the area by people; (9) effectiveness of treatment on the target weed; and (10) cost.

Due to these various factors, one or several treatment methods may be needed in a given area annually for 5 or more years. Manual/mechanical and biological treatments are used to the extent that they are practical, but tend to be less effective and more costly than chemical treatments. Manual/mechanical treatments have limited effectiveness because they often fail to remove noxious weed roots. This type of treatment is costly and feasible only in small areas. However, BPA has found that chemical (herbicide) controls are the cheapest and most effective at controlling noxious weeds.

Initial entry –

The purpose of the vegetation management on the right-of-way is to clear tall growing vegetation and establish a self-sustaining low growing plant community. Removal of this vegetation will ensure continued reliability and stability of the transmission line corridor. Vegetation to be cut includes trees/brush (conifers& hardwoods) that is currently or will soon pose a hazard to the lines. Hardwood trees stumps and re-sprouts will be treated with herbicides (spot and localized treatments) to ensure that the roots are killed preventing new sprouts. Method of application and herbicide will vary according to location and proximity to water resources (see section 3.1). No herbicide is proposed for USFS or BLM lands. All work will take place in existing rights-of-ways. Slash and debris will be mulched or lopped and scattered.

Except on USFS/BLM lands, access roads and tower sites will be treated using selective and non-selective methods including hand cutting, mowing, and herbicide spot, localized and broadcast applications including cut stubble and localized granular treatments.

The selection of methods and herbicides for noxious weed management will be based on their location and proximity to water resources. Treatment will be limited to spot, localized and ground broadcast treatments (see descriptions page). Non-selective treatments using ground broadcast methods may be required in areas of high infestation (monocultures) of weeds and along access roads and tower sites. Localized Granular treatments will also be considered.

Contractor will identify and mark on plan maps any danger trees found off the right-of-way. Cutting of the danger trees will not be done until landowners have been notified and agreed to their removal.

Subsequent entry–

Due to the amount of rainfall, low ground-to-conductor clearance, density and typical growth of lodgepole pine trees, the treatment cycle will be every 8-10 yrs. The same prescription as stated in the initial entry will apply for future cycles.

Analysis: A Vegetation Management Checklist was completed for this project in accordance with the requirements identified in the Bonneville Power Administration's Transmission System Vegetation Management Program FEIS (DOE/EIS-0285). Section 3 of the checklist identifies the natural resources present in the area of the proposed work.

Water Resources: Waterbodies (streams, rivers, lakes, wetlands) occurring in the project area are listed in section 3.1 of the Vegetation Management Checklist. Trees in riparian zones will be selectively cut to include only those that will grow into the minimum approach distances of the conductor at maximum sag. No ground disturbing vegetation management methods will be implemented thus eliminating the risk for soil erosion and sedimentation near the streams. Adjacent to water resources only spot (cut-stump) and localized chemical treatments using practically non-toxic Garlon 3A or Rodeo® will be used.

No drinking water, irrigation wells, or water supplies were identified along the rights of way for this project.

Threatened and Endangered Species: Pursuant to its obligations under the Endangered Species Act, BPA has made a determination of whether its proposed project will have any effects on any listed species or critical fish habitat. A species list was obtained from the United States Fish and Wildlife Service (USFWS) on October 30, 2005, as potentially occurring in the project area. In addition, a review of species under the jurisdiction of NOAA Fisheries was conducted. A determination of No Effect was made for all ESA listed species and designated critical habitat for the project.

Essential Fish Habitat: A review of NOAA database did not identify Essential Fish Habitat (EFH) streams occurring in the project area.

Cultural Resources: No cultural resources are known for the project area. If a site is discovered during the course of vegetation control, work will be stopped in the vicinity and the BPA Environmental Specialist, and the BPA archeologist will be contacted.

Conservation Measures: Conservation measures as identified in Section 4.1 of the Checklist shall be followed during the vegetation management efforts.

Findings: This Supplement Analysis finds that (1) the proposed actions are substantially consistent with the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285) and ROD, and; (2) there are no new circumstances or information relevant to environmental concerns and bearing on the proposed actions or their impacts. This Supplement Analysis also finds the proposed actions will not affect threatened or endangered species. Therefore, no further NEPA documentation is required.

/s/ James R. Meyer for
Frederick J. Walasavage
Environmental Protection Specialist

CONCUR: */s/ Katherine S. Pierce* DATE: 10/31/05
Katherine S. Pierce
NEPA Compliance Officer

Attachment:
Lapine-Chiloquin Vegetation Management Checklist
USFWS Species List Reference # 81450-2006-0023
Effects Determination